EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

UNITED STATES OF AMERICA)
V. CHESTER GALLAGHER; HEATHER IDONI; CALVIN ZASTROW; COLEMAN BOYD; PAUL VAUGHN; DENNIS GREEN)) NO. 3:22-CR-00327) JUDGE TRAUGER))

DECLARATION OF

- I, declare as follows:
- 1. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.
- 2. In March 2021, I served as a clinic manager for carafem located in Mount Juliet, Tennessee.
- 3. In March 2021, dozens of Operation Save America ("OSA") members entered the building and blocked the door to carafem. They chanted and shouted. Patients could not get into the building, and staff were trapped inside.
 - 4. I was on site at the time and I felt very afraid for my safety that day.
- 5. I was also working at the Mount Juliet carafem location on July 26 and July 28, 2022 when OSA blockaders and affiliates caused the clinic to go into lockdown twice. After these incidents, I felt extremely anxious and scared for my safety.
- 6. I continue to work in reproductive healthcare. I am scared of antiabortion extremists discovering where I work. I worry that if they did, they would come to my place of work, harass me, or follow me home when I leave work.

- 7. Out of fear for my family's safety, we increased our home security equipment and measures after the OSA event at carafem in July 2022.
- 8. I am worried that the protesters will learn where I live, and I am fearful for the safety of my family.

I provide the foregoing Declaration pursuant to 28 U.S.C. § 1746 and penalty of perjury.

Dated: January 8, 2024

